



February 26, 2015

BLM Nevada State Resource Advisory Council
c/o Nevada State Office
Bureau of Land Management
1340 Financial Blvd.
Reno, NV 89502

Via Email: crose@blm.gov

Dear Tri-RAC Members:

These comments to the Bureau of Land Management (BLM) Nevada Resource Advisory Council (RAC) are submitted on behalf of the American Wild Horse Preservation Campaign (AWHPC) and endorsed by 13,176 of our supporters.

AWHPC is dedicated to preserving the American wild horse in viable free-roaming herds for generations to come, as part of our national heritage. Our grassroots efforts are supported by a coalition of over 60 horse advocacy, animal welfare and conservation organizations. AWHPC supporters hail from every state in the nation – from New York to Michigan to Mississippi to Nevada – and they care deeply about America’s public lands and our wild horses and burros. These lands and the wild horses that inhabit them belong to *all Americans* and *all Americans* should have a say in their management.

National polls demonstrate that while [72% of Americans support](#) preserving wild horses on our public lands, [less than one-third of the public](#) wants those same lands used for livestock grazing. Yet it is the livestock industry – not the American public – that sets the agenda for the BLM.

This situation must change. Growing numbers of Americans are speaking up for wild horses and burros and the proper management of our public lands. The days of this agency catering to a small group of ranchers at the expense of the public - and our wild horses and burros - are coming to an end.

Nevada is the proud home to nearly half the nation’s wild horses and burros who roam in 83 Herd Management Areas (HMAS). These horses and burros are a significant part of Nevada’s history and culture. But there aren’t many of these proud icons left.

The Numbers

Ranchers across the West – especially those in Nevada – are becoming increasingly vocal about a so-called wild horse “overpopulation” problem. However, their rhetoric about damage caused to the range by mustangs and burros simply is not supported by the facts.

In reality, the wild horses and burros in Nevada are vastly outnumbered by livestock:

- An estimate 23,000 wild horses and 1,500 burros remain on BLM land in the state.
- Mustangs and burros roam on just 14.7 million acres of BLM land in Nevada versus livestock, which graze on 44.8 million acres of BLM land in the state.
- This “appropriate” management level is based on an inequitable resource allocation system. Wild horses receive little of the available forage allocations in designated HMAs while the lion’s share of forage is allocated to livestock.
- Of the 20.9 million acres of sage grouse habitat in Nevada, livestock is present on 18.4 million acres, while wild horses and burros are present on only 6.3 million acres of sage grouse habitat in the state.
- There are 8 times more cattle than wild horses on the 20.9 million acres of identified sage grouse habitat in Nevada where both wild horses and livestock roam.

So why is there such a hyper-focus on a relatively small number of wild horses? The answer is clearly that a concerted effort is underway to scapegoat wild horses for the widespread destruction of our public lands caused by intensive livestock grazing. This was documented very clearly by a recent Public Employees for Environmental Responsibility (PEER) analysis that revealed, *“the method used by the U.S. Bureau of Land Management to assess range conditions is seriously skewed toward minimizing impacts from domestic livestock and magnifying those from wild horses and burros.”* That analysis can be found at this link:

<http://www.peer.org/news/news-releases/2014/09/16/blm-weighs-wild-horse-impact-much-more-heavily-than-cattle/>

A Way Forward

In June 2013, the National Academy of Sciences (NAS) issued a report commissioned by the BLM on the agency’s wild horse and burro program finding that “continuation of business as usual practices will be expensive and unproductive for the BLM and the public it serves.”

Among the report’s key findings are:

- Management practices are fueling high population growth rates

- How Allowable Management Levels (AMLs) are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change
- BLM management practices should be responsive to public attitudes and preferences.
- Tools [including PZP fertility control] already exist for BLM to address many challenges.

Although everyone agrees that the BLM program is broken and in need of reform, change is slow to come. The agency is continuing to remove horses from the range despite the facts that: a) 50,000 wild horses and burros are already stockpiled in government holding facilities; and b) these removals are fueling high population growth, according to the NAS. Further, the agency is pursuing destructive measures, such as the spaying of mares and gelding of stallions, which were specifically recommended *against* by the NAS in a report that the BLM commissioned and funded with nearly \$2 million of taxpayer funds.

As the NAS clearly concluded, solutions to the wild horse management issue are available, but the political will to implement them is lacking. If we are to put the decades-long controversy over wild horse protection to rest, we must all roll up our sleeves and work together on implementing these solutions.

Since wild horses are present on just 31 percent of BLM land in Nevada that is available for livestock grazing, it should be possible to resolve conflicts between wild horses and ranchers. We urge the Tri-RAC to take a leadership role in forging a cooperative path that leads forward on this issue.

Request to the Nevada Tri-RAC

We urge the Tri-RAC members to seriously consider the following recommendations to the BLM as steps forward in reform of the wild horse and burro program.

1. Allocate a fairer share of resources in HMAs to wild horses.

Wild horses must be given a fairer share of resources on the small amount of land that has been legally designated as their habitat in Nevada. Allowable population levels (also referred to as AMLs) must be raised. The current inequitable system of allocating the vast majority of forage resources in designated HMAs to privately owned livestock instead of to federally protected wild horses must change.

BLM regulations (43 CFR 4710.5) specifically authorize the BLM to reduce or eliminate livestock grazing in HMAs “if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury.” Even modest reductions to livestock grazing could accommodate current wild horse population

levels, obviating the need for further costly and cruel removals of wild horses from the range.

We urge the Tri-RAC to recommend that BLM explore compensation for ranchers for reductions in forage allocations (as measured in Animal Unit Months [AUMs]) and that AMLs be raised to, at minimum, accommodate current wild horse population levels. Options for compensation can range from voluntary retirement of AUMs to other forms of compensation to ensure a fair transition. This approach is far more cost-effective for American taxpayers than to continuing to remove and stockpile wild horses in holding facilities.

2. Maintain population levels with PZP fertility control.

The use of PZP fertility control to manage Nevada's wild horse populations is in line with the recommendations of the NAS, as outlined above. AWHPC supports the widespread use of PZP to stabilize, and if need be, reduce wild horse herds over time because it is reversible, non-hormonal and has proved safe and effective for more than two decades of use on wild horses and other wildlife species. The PZP vaccine represents the most humane and cost-beneficial alternative to the current, cost-prohibitive wild horse removals.

In contrast with other fertility control drugs, PZP has the least impact on natural wild horse and herd behavior. To reduce the inherent stress associated with roundup or gather operations, we support the implementation of a policy that would give preference to conducting Capture-Treat-Release (CTR) PZP application operations in a manner that maintains wild horse social structures and family bands. Preference to water and bait trapping options should always be given before resorting to helicopter drive operations.

The BLM removes thousands of wild horses from public lands each year only to warehouse the vast majority in government holding facilities. In 2001, there were approximately 5,000 wild horses in government holding facilities. Today, nearly 50,000 wild horses are stockpiled in government holding facilities, a number that, at minimum, equals, if not exceeds the population remaining on the range.

While complete reform of the BLM's Wild Horse and Burro Program is needed, the widespread use of PZP as a primary means of managing wild horse herds is an immediate first step that must be taken in order to reduce the numbers of horses removed from the range. If the PZP option is not fully implemented, the BLM will likely continue the endless and unsustainable cycle of rounding up, removing and stockpiling wild horses – that comes at a great cost to the wild horses and the American taxpayers.

We urge this Tri-RAC to follow the lead of the BLM Northeastern Great Basin RAC in Nevada, which in August 2014 issued recommendations endorsing this approach to wild horse management.

Supporting Wild Horses and Burros

We strongly encourage the Tri-RAC to support wild horses and burros through encouraging District offices to repatriate wild horses and burros to zeroed-out HMAs where feasible and to end the zeroing-out, or the elimination, of wild horses and/or burros from Congressionally-designated wild horse and burro habitat.

Since Congress unanimously passed the 1971 Wild Free-Roaming Horses and Burros Act, the BLM has systematically eliminated approximately 40% of the originally designated wild horse and burro habitat. This dramatic reduction of land available for wild horses and burros highlights the need to repatriate horses and burros to these lands where feasible and to end this devastating trend.

Final Thoughts

For the 13,176 citizens who have endorsed these comments and the hundreds of thousands who have spoken up over the last few years for wild horse and burro protection, this is personal. These citizens care deeply about how our public lands are managed. They care deeply about our wild horses and burros and are pained by the continued tragic and unnecessary roundup and removal of thousands of wild horses from their homes on the Western range.

The NAS concluded that these concerns are important: "Horse and burro management and control strategies cannot be based on biological or cost considerations alone; management should engage interested and affected parties and also **be responsive to public attitudes and preferences.**"

The recommendations outlined above make good fiscal sense and are in line with the public's support for protection of wild horses and burros on our Western public lands.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Roy". The signature is written in dark ink and is positioned above the printed name and title.

Suzanne Roy, Director
American Wild Horse Preservation Campaign